

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION**

JUNE O'HEARN, Individually and)	
Derivatively on Behalf of MEDIENT)	
STUDIOS, INC.,)	
)	
Plaintiff,)	Civil Action No.: 4:14-cv-00186-BAE-GRS
)	
vs.)	
)	
CHARLES KOPPELMAN, JOSEPH)	
GIAMICHAEL, DAVID PATERSON,)	
JOEL SHAPIRO a/k/a JAKE SHAPIRO,)	
MANU KUMARAN and MEDIENT STUDIOS,)	
INC. a/k/a MEDIENT STUDIOS INDIA)	
PVT, LTD.,)	
)	
Defendants.)	

DECLARATION OF JOHN M. TATUM

JOHN M. TATUM declares under penalty of perjury as follows:

1. I am a member of the Bar of this Court and of Hunter Maclean, attorneys for Defendants CHARLES KOPPELMAN, JOSPEH GIAMICHAEL, DAVID PATERSON, JOEL SHAPIRO a/k/a JAKE SHAPIRO and MEDIENT STUDIOS, INC. ("Medient") (collectively, the "Defendants"). I make this Declaration in support of Defendants' motion, pursuant to Fed. R. Civ. P. 12(b)(1), 12(b)(6), 9(b) and the Private Securities Litigation Reform Act, to dismiss the Complaint filed herein.

2. A true and correct copy of Medient's Form 8-K, dated May 22, 2014, is attached hereto as Exhibit A.

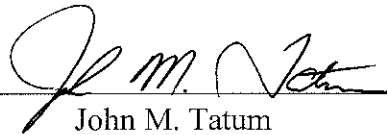
3. A true and correct copy of the Schedule 14C Information Statement of Medient filed with the Securities and Exchange Commission (the "SEC") on February 13, 2014, is attached hereto as Exhibit B.

4. A true and correct copy of the Schedule 14C Information Statement of Medient filed with the SEC on March 17, 2014, is attached hereto as Exhibit C.

5. A true and correct copy of the Schedule 14C Information Statement of Medient filed with the SEC on August 28, 2012, is attached hereto as Exhibit D.

6. A true and correct copy of the SEC Release, dated June 25, 2014, is attached hereto as Exhibit E.

Dated: September 16, 2014



John M. Tatum

CERTIFICATE OF SERVICE

I, John M. Tatum, hereby certify that on September 16, 2014, I have electronically filed **Declaration of John M. Tatum** with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

Ashleigh Madison
Southeast Law, LLC
426 Barnard Street
Savannah, Georgia 31401

HUNTER, MACLEAN, EXLEY & DUNN, P.C.

s/John M. Tatum

John M. Tatum
Georgia State Bar Number 699000
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Paterson, Shapiro and Medient Studios, Inc.*

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